

**STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION**

Illinois Bell Telephone Company)	
)	02-0864
Filing to increase Unbundled Loop)	
and Nonrecurring Rates)	

**RESPONSE OF ALLEGIANCE TELECOM OF ILLINOIS, INC.,
MCLEODUSA TELECOMMUNICATIONS SERVICES, INC.,
NUVOX COMMUNICATIONS OF ILLINOIS, INC.,
RCN TELECOM SERVICES OF ILLINOIS, LLC AND TDS METROCOM, LLC
TO STAFF'S MOTION CONCERNING DEADLINE
FOR IMPUTATION ANALYSIS**

Allegiance Telecom of Illinois, Inc., McLeodUSA Telecommunications Services, Inc., Nuvox Communications of Illinois, Inc., RCN Telecom Services of Illinois, LLC and TDS Metrocom, LLC ("Allegiance et al.") hereby respond to the "Motion to Require Parties to Register Concurrence, or Refusal to Concur, in an Extension of the Period for the Commission to Rule Upon Imputation, or, in the Alternative, for a Determination that Certain Competitive Services of SBC Illinois Do Not Satisfy Imputation Tests as Required by Section 13-505.1 of the Public Utilities Act Based on the Increases in Wholesale Rates Proposed by SBC Illinois", filed by the Commission Staff ("Staff Motion").

1. Allegiance et al. agree with Staff that the imputation test requirements of Section 13-505.1 of the Public Utilities Act (220 ILCS 5/13-505.1) are applicable to certain retail rates of SBC Illinois, and are triggered by SBC Illinois' filing of proposed new UNE rates in this proceeding. (See Staff Motion, par. 7-8)

2. Allegiance et al. also agree that the evidence filed to date in this case (both the direct case evidence filed by SBC Illinois, and evidence filed by Staff and by other parties on May 6, 2003), show that if the new UNE rates proposed by SBC Illinois in this case were

approved, certain current retail rates of SBC Illinois would fail the Section 13-505.1 imputation test.

3. Nevertheless, although the Commission could issue an order now (and certainly, by June 8, 2003) finding that certain SBC Illinois retail rates fail the Section 13-505.1 imputation test based on the UNE rates proposed by SBC Illinois in this proceeding, Allegiance et al., concur with Staff that the more administratively-efficient way to address the imputation issue in the context of this docket is to address it in the final order. Staff's suggested approach has the additional benefit that if the Commission drastically reduces, or rejects completely (as it should), SBC Illinois' proposed UNE price increases, the issue presented by the failure of certain SBC Illinois retail rates to pass the imputation test will probably be mooted.

4. Accordingly, Allegiance et al. concur in an extension of the period for the Commission to rule upon imputation with respect to the UNE rates proposed by SBC Illinois in this case, until the final order date in this docket.

Dated: May 7, 2003

Respectfully submitted,

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